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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

NATHANIEL WOODS, JR.,

Plaintiff,

v.

BAYER HEALTHCARE, Biological Products
Division, a for profit business entity,

Defendant.

CASE NO. C-05-02871 JSW

**STIPULATION AND ~~PROPOSED~~ ORDER
PROTECTING PARTIES'
CONFIDENTIAL INFORMATION AND
ALLEGED TRADE SECRETS**

TRIAL DATE: None Assigned

Hon. Jeffrey S. White

1 WHEREAS, on December 8, 2003, *Jones, et al. v. Bayer* was filed as a putative class
 2 action, with the named plaintiffs of Lavon Jones, Nathaniel Woods, Haben Berhane, and Dwight
 3 Dove;

4 WHEREAS, on November 22, 2004, the putative class action allegations were removed
 5 from the Jones et al. complaint when the plaintiffs filed their 2nd Amended Complaint;

6 WHEREAS, on June 2, 2005, defendant Bayer HealthCare along with plaintiffs Lavon
 7 Jones, Nathaniel Woods, Haben Berhane, and Dwight Dove entered into a Stipulation Protecting
 8 Parties' Confidential Information and Alleged Trade Secrets, pursuant to Rule 26(c)(7);

9 WHEREAS, on June 21, 2005, the Court "ORDERED that the Stipulation be adopted in its
 10 entirety...";

11 WHEREAS, Bayer's motion to sever was granted in the *Jones, et al.* matter by this Court
 12 on June 23, 2005. Plaintiff Woods filed his individual Complaint on July 14, 2005, based largely
 13 on the same individual allegations as the *Jones, et al.* suit. While no longer one suit, the individual
 14 actions continue to be deemed related;

15 WHEREAS, plaintiff, on the one hand, and Bayer, on the other hand, are collectively
 16 adverse, they agree through their respective counsel and stipulate as follows:

- 17 1. Nathaniel Woods and Bayer HealthCare do hereby re-adopt the Stipulation
 18 Protecting Parties' Confidential Information and Alleged Trade Secrets. A true and
 19 accurate copy of the Stipulation and Order is attached hereto as Exhibit A.
- 20 2. Both parties to this suit retain their duties and responsibilities as stipulated and
 21 ordered in the Stipulation Protecting Parties' Confidential Information and Alleged
 22 Trade Secrets.

23
 24 **IT IS SO STIPULATED.**

25 DATED: March 16, 2006

MOORE & MOORE

27 By: s/Howard Moore, Jr.
 HOWARD MOORE, JR.
 Attorneys for Plaintiff
 NATHANIEL WOODS

1 DATED: March 16, 2006

By: s/Charles Stephen Ralston
CHARLES STEPHEN RALSTON
Attorney for Plaintiff
NATHANIEL WOODS

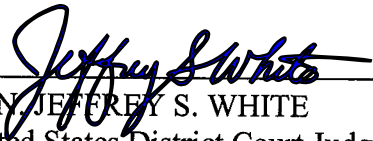
2
3 DATED: March 16, 2006

THE LOUDERBACK LAW FIRM

4
5 By: s/Jerome Schreiberstein
JEROME SCHREIBSTEIN
JAMES T. CONLEY
Attorneys for Defendant
BAYER HEALTHCARE

6
7
8
9 **IT IS SO ORDERED.**

10
11 DATED: March 17,
12 _____, 2006

13
14 
15 HON. JEFFREY S. WHITE
16 United States District Court Judge
Northern District of California

17 #37092